

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,)	
Plaintiffs,)	C.A. No. 05-0221S
)	(Related Case Nos.: 05-522S,
v.)	05-274S, 05-370S)
)	
NEW ENGLAND GAS COMPANY;)	
SOUTHERN UNION COMPANY)	
Defendant and)	
Third-Party Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC and)	
HONEYWELL INTERNATIONAL INC.)	
Third-Party Defendants.)	

**THIRD¹ JOINT MOTION TO CONTINUE HEARING DATE
ON THE SIMPSON FAMILY TRUST'S MOTION TO QUASH**

Non-Party the Simpson Family Trust (the "Trust") and Third-Party Plaintiff Southern Union Company/New England Gas Company (collectively, "Southern Union") respectfully submit their third joint request that the Court continue the hearing on the Trust's Motion to Quash the Subpoena of Southern Union, presently scheduled for Thursday, July 26, 2012, for an additional thirty (30) days because an anticipated settlement between Southern Union and Third-Party Defendant Bridgestone Americas Tire Operations, LLC ("Bridgestone") will obviate the need for the subpoena to inspect and sample the land at issue in the Trust's Motion.

As noted in the parties' initial and second Motions to Continue Hearing Date, Southern Union and Bridgestone recently engaged in mediation and reached a settlement in principle.

¹ The initial Joint Motion to Continue Hearing was filed on May 25, 2012 (Doc. 1006), and granted via text order entered later that day. The Second Joint Motion to Continue Hearing Date was filed on June 20, 2012 (Doc. 1007) and granted via text order entered later that day.

Since that time, Southern Union and Bridgestone have worked together and made significant progress towards finalizing the language of the parties' settlement documents. But while Southern Union and Bridgestone continue to work on the proposed settlement documents, it is unlikely that this will occur before the hearing presently scheduled for July 26, 2012.

Because the anticipated Southern Union-Bridgestone settlement will not be finalized before the July 26, 2012 hearing, and because that settlement, and Bridgestone's dismissal from the case, will render moot Southern Union's subpoena to the Trust, as well as the Trust's Motion to Quash, the Trust and Southern Union respectfully request that this Court continue the hearing on the Trust's motion for thirty (30) days.

Respectfully Submitted,

SOUTHERN UNION COMPANY AND
NEW ENGLAND GAS COMPANY

SIMPSON FAMILY TRUST,
By its Attorney,

By its Attorneys,

/s/ Robin L. Main

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Dated: July 23, 2012

CERTIFICATE OF SERVICE

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I hereby certify that on the 23rd day of July, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

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